## UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

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IN RE:		CASE NO.: 6:15-bk-10589-KSJ CHAPTER 13
HUY MINH LY,		
Debtor.		
	/	

## MOTION FOR THE CONTINUATION OF THE AUTOMATIC STAY AS TO ALL CREDITORS

Pursuant to 11 USC §362(c)(3), the automatic stay in this case terminates 30 days after the petition was filed.

Debtor needs to have the automatic stay extended as to all creditors during the pendency of the case, in order that Debtor may safeguard his homestead and personal property.

This case was filed in good faith as to all creditors.

The Debtor's previous case was dismissed for failure to make payments. Debtor lost his job which prevented him from making payments.

The Debtor has since experienced a change in financial circumstances. Debtor has obtained a new job that will allow him to make his ongoing payments.

Debtor is also making payments by way of wage deduction order to ensure timely and full payment to the Trustee.

WHEREFORE, Debtor respectfully requests the Court to extend the automatic stay and grant any other relief deemed just.

DATED: December 23, 2015 The Law Offices of Keith D. Collier

/s/ Keith D. Collier, Esquire **KEITH D. COLLIER** Florida Bar No.: 0633771

Jacksonville, Florida 32204 (904) 981-8100/Fax: 981-8015 Collier@KeithDCollier.com Attorney for Debtor

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing has been furnished by Electronic Mail or U.S. Mail to all parties of interest listed on the attached mailing matrix this December 23, 2015.

/s/ Keith D. Collier, Esquire **KEITH D. COLLIER** 

Label Matrix for local noticing Case 6:15-bk-10589-KSJ Doc 9 ORL Filed 12/23/15 Page 3 of 5 Market States Trustee 9 ORL Filed 12/23/15 Page 3 of 5 Market Page 3 Market Page 3

Case 6:15-bk-10589-KSJ Middle District of Florida

Orlando

Wed Dec 23 12:08:12 EST 2015

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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Bypassed recipients 0
Total 65